

Louisville and Jefferson County Metropolitan Sewer District 700 West Liberty Street Louisville Kentucky 40203-1911 502-540-6000 www.msdlouky.org

April 10, 2012

Hepburn Avenue Louisville, KY 40204

Subject: Integrated Overflow Abatement Plan

Public Input Meeting, January 24, 2012

Response to comments

Dear

Thank you for taking the time to submit your questions and comments relative to the Integrated Overflow Abatement Plan at the January 2012 meeting. Your comments relative to the I-64 & Grinstead Drive Storage Basin are summarized below, and your email is attached for reference.

<u>Comment 1</u> – Continue your effort to reduce the final basin sizes using the green infrastructure model.

Response to Comment 1 – We appreciate your support for our efforts to use green infrastructure to reduce the amount of stormwater reaching the combined sewer system, thereby reducing the need for gray infrastructure CSO control. MSD has begun the site evaluation process for the 2 square mile drainage area that flows toward the proposed I-64 & Grinstead Drive storage basin. MSD intends to have the first few green infrastructure projects in the area moving forward into design within 6 to 8 weeks. We plan to ask EPA Region 4 and KDEP for a schedule modification to allow us time to install and measure the benefits of green infrastructure in this basin. Your continued support through the IOAP modification process would help us achieve our goals of maximizing the cost-effective use of green infrastructure to reduce the size of CSO control storage basins.

<u>Comment 2</u> – Increase the public education component of Project WIN to the end that further reduction of gray infrastructure can be achieved.

Response to Comment 2 – MSD will continue the IOAP Project Review and Public Input meetings and is currently developing significant revisions to the website to help provide more educational information. We are also continuing to develop our public outreach program to reach a wider audience. Over the next few months we will be rolling out a program called "Know where it goes" to educate our community on the consequences of our



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every day decisions and how we can make small changes in our actions to help reduce sewer overflows.

<u>Comment 3</u> – Investigate opportunities for 'repatriation' of pervious areas for green infrastructure in the Irish Hill neighborhood.

Response to Comment 3 —MSD's green infrastructure approach is discussed in the answer to Comment 1. Providing opportunities for impervious areas to be converted back to the original pervious state is the most comprehensive (and land-intensive) approach to providing green infrastructure. Most of MSD's green infrastructure projects will route surface drainage across an impervious surface and into a pervious area like a rain garden. This allows the maximum impervious area to be disconnected from the combined sewer system while minimizing the changes to land use (and potentially ownership).

Comment 4 – Minimize the impact to the adjacent wetland and existing forested areas during and after construction.

Response to Comment 4 – MSD will minimize the impact to the wetland area – currently, little to no disturbance is planned. While we will attempt to disturb the forested area as little as possible, some tree clearing is necessary. The extent of clearing depends on the size of the basin and the final location selected. MSD will likely propose a tree replacement approach in another area to mitigate this clearing, but we understand the value of mature trees and will do what we can, within the limits of practicality, to protect and preserve the existing trees.

<u>Comment 5</u> – Minimize the impact to surrounding neighbors during construction (including excavation by blasting) and after construction for site access.

Response to Comment 5 – In the currently proposed site some blasting will be required to allow excavation below the level of the current CSO control structures. MSD has established procedures to minimize the effect of blasting on nearby residents and businesses. We will require pre-blast surveys, accelerometer measurements of blasting impacts, etc. MSD will notify property owners in the vicinity of planned blasting well in advance of any blasting. Blasting will be planned to have no long-term impact on structures in the area.

<u>Comment 6</u> – Consider Beargrass Creek in the Irish Hill neighborhood for any required flood plain mitigation due to construction.

<u>Response to Comment 6</u> – MSD will keep the Beargrass Creek reach in the Irish Hill neighborhood in mind should any floodplain mitigation be required, including the meander adjacent to the basin.

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<u>Comment 7</u> – Consider the restoration of the existing meander adjacent to the Grinstead basin during construction of that basin.

Response to Comment 7 – Since the basin size, configuration, and location will not be finalized until the impacts of green infrastructure can be evaluated, it is premature to make commitments relative to the future status of the meander. In previous evaluations, however, MSD determined that the cost to restore the meander could be well over one million dollars, with no direct project benefit related to CSO control. It is anticipated that the US Army Corps of Engineers would not allow the reduction in hydraulic capacity in the creek if all flow were routed through a meander, so permitting and hydraulic design issues would be significant. Given the cost and technical obstacles related to this action, MSD cannot promise that the meander will be restored, but consideration will be given to some form of meander restoration as the project is further developed.

<u>Comment 8</u> – Consider the specific location of the River Metals basin in light of the future development on that property and the preservation of green space behind the residents in the 1300 block of Lexington Road.

Response to Comment 8 – The River Metals site is the current location of a smaller basin to control another group of CSOs. Cost projections to build conveyance lines from the overflows at the I-64 & Grinstead Drive storage basin site and carry overflows to the River Metals site have shown this option to be cost-prohibitive. However, MSD continues to review alternative ways of conveying the flow through pumping or alternative construction means.

Please feel free to contact us should you have any comments or questions.

This letter will be posted on MSD's Project WIN web page at the link: www.msdlouky.org/projectwin.

Sincerely,

W. Brian Bingham

Regulatory Services Director

W. B. Bifu

Attachment: e-mail comments

From:
To: <commentsIOAP@msdlouky.org>
Date: 2/16/2012 4:37 PM
Subject: CSO Basins in Irish Hill
CC:

CSO Basins in Irish Hill

MSD IOAP Project Comments Attn: Project WIN Program Manager 700 West Liberty St. Louisville, KY 40203

Dear Justin et al,

Thank you for hosting the project review input meeting at Kyana GS on Jan. 24, 2012. The Irish Hill Neighborhood Association appreciates being a part of this discussion. We think that it is a great idea to begin the public input process this far in advance of the actual construction.

Regarding the I-64 & Grinstead and River Metals basins, our comments are as follows.

- 1. Continue your effort to reduce the final basin sizes using the green infrastructure model.
- 2. Increase the public education component of Project WIN to the end that further reduction of gray infrastructure can be achieved.
- 3. Investigate opportunities for 'repatriation' of pervious areas for green infrastructure in the Irish Hill neighborhood.
- 4. Minimize the impact to the adjacent wetland and existing forested areas during and after construction.
- 5. Minimize the impact to surrounding neighbors during construction (including excavation by blasting) and after construction for site access.
- 6. Consider Beargrass Creek in the Irish Hill neighborhood for any required flood plain mitigation due to construction.
- 7. Consider the restoration of the existing meander adjacent to the Grinstead basin during construction of that basin.
- 8. Consider the specific location of the River Metals basin in light of the future development on that property and the preservation of green space behind the residents in the 1300 block of Lexington Road.

Again, we look forward to participating and we thank you for your efforts.

Regards,

Irish Hill NA Lexington Road Louisville KY 40204